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**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

CANA FOUNDATION, a non-profit  
 corporation, LAURA LEIGH, individually, and  
 WILD HORSE EDUCATION, a nonprofit  
 corporation,

*Plaintiffs,*

v.

UNITED STATES DEPARTMENT OF THE  
 INTERIOR, BUREAU OF LAND  
 MANAGEMENT, and JON RABY, Nevada  
 State Director of the Bureau of Land  
 Management,

*Federal Defendants.*

Case No. 2:22-cv-01200-CDS-BNW

**JOINT MOTION TO EXTEND THE  
 BRIEFING DEADLINES FOR  
 PLAINTIFFS' MOTION FOR  
 JUDICIAL NOTICE [ECF NO. 51]**

Plaintiffs Laura Leigh, Cana Foundation, Wild Horse Education, and Federal  
 Defendants the Bureau of Land Management and Jon Raby, in his official capacity as the State  
 Director for the Bureau of Land Management in Nevada respectfully request that the Court  
 extend the briefing deadlines for Plaintiffs' Motion for Judicial Notice, filed on December 15,  
 2023, ECF No. 51, to align them with the parties' summary judgment briefing deadlines.

Under Local Rule of Civil Practice 7-2(b), Federal Defendants' response to Plaintiffs'  
 motion for judicial notice is currently due on December 29, 2023, and Plaintiffs' reply is due

January 5, 2024. *See* LR 7-2(b). Because Plaintiffs' motion for judicial notice was filed simultaneously with their motion for summary judgment (ECF No. 50) and relates to their request for summary judgment, the parties believe that it would be most efficient to align the briefing deadlines for Plaintiffs' motion for judicial notice (ECF No. 51) with the summary judgment deadlines set forth in the Court's Order entered on September 27, 2023 (ECF No. 49).

Accordingly, the parties request that the Court extend Federal Defendants' deadline to respond to Plaintiffs' motion for judicial notice to February 23, 2024 (the same day that Federal Defendants' cross-motion for summary judgment and opposition to Plaintiffs' motion for summary Judgment are due), and that the Court extend Plaintiffs' deadline to file their reply in support of their motion for judicial notice to March 22, 2024 (the same day that Plaintiffs' reply in support of their motion for summary judgment and opposition to Federal Defendants' cross-motion for summary judgment are due).

Dated: December 18, 2023

Respectfully Submitted,

TODD KIM, Assistant Attorney General  
United States Department of Justice  
Environment and Natural Resources Division

/s/ Michelle M. Spatz

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on December 18, 2023, I filed the foregoing Joint Motion to Extend the Briefing Deadlines for Plaintiffs' Motion for Judicial Notice electronically through the CM/ECF system, which caused all parties or counsel of record to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Michelle M. Spatz  
Michelle M. Spatz  
U.S. Department of Justice